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September 24, 2018

Secretary of Transportation
United States Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590
Attn: Blane A. Workie, Assistant General Counsel for Aviation Enforcement Proceedings

Re: Submission in *NABR v. United Airlines et al.* Docket No. DOT-OST-2018-0124

Dear Madam Secretary:

We are submitting this letter to provide the Department of Transportation (DOT) with information that may be relevant to its evaluation of the above referenced complaint, which alleges that various airlines refuse to carry animals for critical biomedical research, but carry them for other purposes.

As the largest private university in the country, New York University has an extensive research portfolio which includes over \$300 million in federal funding, most of which is devoted to research in the life sciences. Animal research is a key component of biomedical research and has been a cornerstone in most of the medical breakthroughs in the past 50 years.

Researchers must rely on live-animal research to safely develop treatments for both people and animals alike. Access to live-animal subjects is required in order to conduct this revelatory work. In fact, current laws and regulations mandate this kind of research before life-saving medicines and treatments may be approved for use in humans. The use of animals is highly regulated by both the USDA and the PHS to ensure their humane treatment and to ensure that the minimum number of animals required to achieve scientifically valid results are involved.

According to the complaint, many airlines refuse to transport animals for these vital scientific discoveries, although the airlines will transport the same animals for non-research purposes, such as for zoos or as pets. We believe that as long as the government recognizes the value of this research and requires the use of laboratory animals, it should also enforce its laws in a way

that does not undermine these essential research requirements. This arbitrary delineation by the airlines - which we understand has no transportation related purpose - threatens the progress of key research, research which could reduce or even eradicate diseases.

We urge the DOT to investigate the complaint filed by NABR and to require all airlines to eliminate policies which discriminate against animal carriage and instead base carriage solely on the fact that the purpose of the transportation of animals is for legal, legitimate, necessary and essential life-saving biomedical research. We respectfully request that DOT take these actions to ensure the continued progress of essential medical research.

Sincerely,

Marti L. Dunne